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MEMO ENDORSED

March 25, 2020

Honorable Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Chambers 2550
New York, New York 10007

3/27/20
Matter adj to May 5, 2020
At 3PM.
Colleen McMahon

Re: *United States v. Fernandez et al*, 12-cr-445-CM-10

Dear Chief Judge McMahon:

I write with the consent of the Government and the Probation Department to request a three-week adjournment of our upcoming Violation of Supervised Release (VOSR) hearing for defendant Lamont Robinson, which is currently scheduled for April 1, 2020 at 2:15 pm.

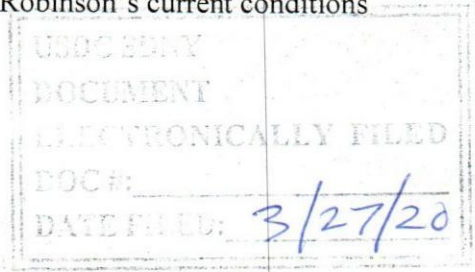
Procedural History

We first appeared on this matter in front of Your Honor on September 23, 2019. A VOSR hearing in this case was originally scheduled for November 19, 2019. With the consent of the Government and the Probation Department, we previously requested four adjournments of that hearing, which the Court granted. The hearing was adjourned to April 1, 2020 at 2:15 pm.

Request for Adjournment

As the Court is aware, Mr. Robinson currently has an open criminal case in Bronx County (#01086-2019) for which the next scheduled appearance is on April 14, 2020. However, it is our understanding that in light of the COVID-19 outbreak, many cases and appearances currently scheduled in the Bronx are in the process of being adjourned. Furthermore, Mr. Robinson's counsel in the state case is contesting the completion of the certificate of compliance recently filed by the District Attorney in the Bronx pursuant to New York State's recently enacted discovery reforms. *See* N.Y. CPL § 245. An evidentiary motion is also still pending in the state case. As the court is aware, the alleged criminal conduct in the Bronx forms the bases for the alleged violations of the conditions of Mr. Robinson's supervised release, and we believe it would be prudent to have an opportunity to be fully briefed on the proceedings in state court prior to appearing again before Your Honor.

With the consent of the Government and the Probation Department, I am therefore requesting a three-week adjournment until the week of April 20 to give the parties time to see what developments occur in the Bronx matter and how the courts are addressing the virus outbreak before we next appear in this case. I ask further that Mr. Robinson's current conditions of release remain in place until our next appearance.



Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sean Hecker", with a stylized flourish at the end.

Sean Hecker

cc: (by ECF)

Samuel P. Rothschild and Andrew Adams
Assistant United States Attorneys

Erin Weinrauch
United States Probation Officer